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ROCKY FLATS PLANT

CORRESPONDENCE CONTROL

Rocky Flats Office



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Construction Projects Planned for Areas Contaminated with Polychlorinated Biphenyls

M. R. Glaser, Acting Manager Facilities Project Management EG&G Rocky Flats, Inc.

Reference: 1) Memorandum from M. R. Glaser (92-RF-4879) to T. E. Lukow, May 8, 1992, subject: Construction Projects: Electrical System Upgrade, FCAP 88-Authorization #388801 Building Electrical Rehabilitation, FCAP 90-Authorization #309905-MRG-246-92.

> Memorandum from Martin Hestmark, U. S. Environmental Protection Agency (EPA) to Frazer Lockhart, dated July 26 1990 subject: Notification of Polychlorinated Biphenyls (PCB) Spills.

Memorandum from David P. Simonson ERD:BKT:6384 to J. M. Kersh, dated August 13, 1992, subject: Notification of PCB Spills.

Several points in your referenced memorandum require clarification. Please provide responses to the following questions and requests for information.

- Describe the regulatory status of contaminated soil and debris excavated or moved during the upgrade project.
- If applicable, will excavation followed by replacing contaminated soils or other materials be considered as "placement?"
- Are any of the construction sites in areas that are contaminated only with PCBs?
- If the answer to item 3 is yes, why are these sites being addressed under the Interagency Agreement instead of the Toxic Substances Control Act?
- How will contaminated soil from excavations be characterized and managed?
- How much total waste will be produced?
- When will waste characterization results on the wastes be available, or will the wastes be characterized by process knowledge?
- Where will the wastes be stored?
- Who will be responsible for management of any wastes generated?
- 10. If any PCB waste will be generated, what process will be followed to ensure timely disposal?
- 11. What is the funding source for waste disposal?
- 12. According to reference 2, "Further investigation of suspected releases shall be pursuant to approved RFI/RI workplans or amendments required by EPA and the State of Colorado." This is re-emphasized in reference 3 (attached) which goes on to say that "..., it may be prudent to suspend any planned PCB characterization activities until EPA and CDH approval is obtained." (emphasis added) Provide specific information as to how EG&G is meeting these requirements, and what actions have been taken to obtain the approval of the regulatory agencies.

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M. R. Glaser

Please provide your response to this memorandum within three weeks after receipt. If you have any questions, please contact Fred Gerdeman at extension 6203.

For fehow

Thomas E. Lukow, Director Waste Management and Environment Division

Attachment: As stated

cc with Atachment:

T. E. Lukow, WMED, RFO

F. Lockhart, ERD, RFO

B. Thatcher, ERD, RFO

R. L. Craun, CD, RFO

J. L. Posluszny, PD, RFO

F. W. Gerdeman, WOB, RFO P. S. Goode, EG&G

R. C. Baker, EG&G

A. A. Church, EG&G